

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

IN RE ARMANDO R. VILLALOBOS §
§ MISC. NO. _____
§

**ARMANDO R. VILLALOBOS'S EMERGENCY MOTION FOR HEARING AND
REQUEST FOR NOTIFICATION OF INDICTMENT**

The government has represented to the undersigned counsel that on May 7, 2012, the government will present to a grand jury a criminal case against Armando R. Villalobos. The government has refused the undersigned counsel's request to allow Mr. Villalobos to turn himself in to authorities following indictment Armando R. Villalobos files this motion to request that the Court notify Mr. Villalobos if and when a true bill is returned in order to allow Mr. Villalobos to turn himself in to authorities voluntarily within one hour of the notification.

Because Mr. Villalobos currently serves as the Cameron County District Attorney, an office he has held since January 1, 2005, his safety will be jeopardized if he is arrested and placed in jail in the very county seat in which he serves. On May 7, the day of the expected indictment, Mr. Villalobos will seek to be interviewed by the U.S. Pretrial Services for the Southern District of Texas in Brownsville (this cannot be done until that office can verify his indictment through a summons, warrant, or other document). Mr. Villalobos requests that this Court notify him if and when a true bill is returned. Mr. Villalobos is not a flight risk and agrees to turn himself in to authorities within one hour of his receipt of the notification. Mr. Villalobos requests that the Court set this matter for an emergency hearing.

Respectfully submitted,

/s/ Joel M. Androphy
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**ATTORNEYS FOR
ARMANDO R. VILLALOBOS**

CERTIFICATE OF CONFERENCE

Sometime last week, I spoke with Assistant United States Attorney Michael Wynne, and he is opposed to self-reporting.

/s/ Joel M. Androphy
Joel M. Androphy

CERTIFICATE OF SERVICE

On May 7, 2012, a true and correct copy of the foregoing document was served on Assistant United States Attorney Michael Wynne via hand delivery and/or e-mail.

/s/ Joel M. Androphy
Joel M. Androphy